

Exhibit E



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June 18, 2024

Confidential
Via E-mail

Alejandro A. Abreu
Assistant United States Attorney
United States Attorney's Office, Northern District of Ohio
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

Re: United States v. Spivak et al., June 30, 2023 Discovery Disclosure

Dear Assistant United States Attorney Abreu:

We have discovered that your June 30, 2023 production included a document that is protected by the attorney-client privilege. *See* USA_FBI-000849 (the "Privileged Communication"). Given this discovery, we suspect that the United States has reviewed this and other privileged communications. Consistent with your ethical obligations and the Justice Manual guidelines, please provide the following information:

1. Where the Privileged Communication was seized from;
2. Who reviewed the Privileged Communication;
3. Whether you or anyone else involved in prosecuting this case has seen the Privileged Communication;
4. Whether you or anyone else involved in prosecuting this case has talked to anyone that has seen the Privileged Communication about the contents of the document;
5. Whether the United States has reviewed other privileged communications;
6. What steps were taken to ensure that privileged materials were not improperly viewed, seized, or retained during the course of the investigation and prosecution of this matter.

Please respond by June 28, 2024 so that we have significant time to address this serious issue with the Court.

Alejandro A. Abreu
June 18, 2024
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Sincerely,

/s/ David L. Axelrod

David L. Axelrod